

MURAKAMI MANUFACTURING USA, INC.
575 WATER TOWER BYPASS
CAMPBELLSVILLE KY 42718

EXECUTIVE SUMMARY

Permit Number F-01-032 (Revision 2):

Significant Revision:

The facility is classified as a conditional major/synthetic minor source and operates under a conditional major permit # F-01-032 (Revision 1). Total potential emissions for the facility are greater than 100 tons threshold for criteria pollutants and above 10 tons for a single HAP and 25 tons for combined HAPs. The actual emissions from the plant are far below those calculated for their PTE, and therefore the facility has accepted operational limitations to maintain its emissions below the major source thresholds. By accepting its current permit, the source has agreed not to emit more than 95 tons of VOCs, 9.5 tons of a single HAP and 23.75 tons of combined HAPs in a 12 consecutive month period.

The facility was originally permitted in November 2001, when it operated one painting line (Line 1). This paint line contains only controls for particulates. On December 30, 2004, the source submitted an application to install a second coating line (Line 2); the facility is operating under a revised conditional permit issued July 13, 2005. The process elements in Lines 1 and 2 are essentially identical. However, Line 2 was installed using equipment supplied by a Japanese vendor; this equipment includes integrated carbon filters that were sold as standard equipment on the paint booth. When Murakami applied for a modification to its operating permit, the application indicated the carbon filters provided VOC control. As a result, the permit # F-01-032 (Revision 1) requires Murakami to determine the both the capture efficiency and performance of the carbon adsorption filters.

On December 14, 2005 on behalf of Murakami, Shield requested an extension to the 180 day allowance for performance testing stated in their permit. The request was made to give Shield an opportunity to review and evaluate the relevant information concerning Line 2 emissions. On January 6, 2006, the Division, agreed to extend the testing deadline to February 28, 2006.

On February 13, 2006, on behalf of Murakami, Shield Environmental Associates, Inc has submitted an engineering evaluation to the confirm the emissions from the facility and to ensure that all emission points from Line 2 have been addressed.

The Division reviewed the engineering evaluation and determined that the source accepts the carbon filters provide 0% control, and performance testing should not be required. If no performance testing is required, the issue of capture efficiency is also not an issue since the facility accepts that 100% of all VOCs and HAPs used at the plant are eventually emitted to the atmosphere. The source will not remove carbon filters from the booth and will not take any credit for VOCs/HAPs control.

Due to the significant changes in the monitoring, reporting and record keeping requirements this revision is considered as a significant per 401 KAR 52:30 Section 6 (1)(a).

PUBLIC, AND U.S. EPA REVIEW:

The U.S. EPA was notified of the issuance of the draft permit on March 12, 2006 via e-mail. On March 20, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in Central Kentucky News-Journal in Campbellsville, Kentucky. The public comment period expired 30 days from the date of publication. The Comment was received from Shield Environmental Associates, Inc. on behalf of the source. This comment was incorporated in the final permit (Please see attachment B). No comments were received from the US EPA. The permit is now being issued final.